

**FILED**

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

JUL 12 2016

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**RAYMUNDO MUÑOZ,**  
**JUAN FRANCISCO RIVERA,**  
a.k.a. "JC,"  
**ELEODORO SANCHEZ,**  
a.k.a. "Lolo,"  
**SALVADOR DELGADILLO,**  
a.k.a. "Spooky,"  
**CARLOS DIAZ,**  
a.k.a. "Boxer,"  
**MORHIAMA ABIGAIL AVILA,**  
**SANDRA FRANCIS GUZMAN,**  
**BLANCA ELISA TOVAR,**  
a.k.a. "La Guera,"  
**ALBERTO LOZANO-MORALES,**  
a.k.a. "Beto," and  
**ARMANDO DANIEL MARQUEZ,**  
a.k.a. Danny Marquez,

Defendants.

**MATTHEW J. DYKMAN**

CRIMINAL NO. **16CR3043 RB**

Count 1: 21 U.S.C. § 846: Conspiracy;

Counts 2, 6, 17, 18, 22, 23: 21 U.S.C. §  
843(b): Use of a Communication Facility  
to Further the Commission of a Drug  
Trafficking Crime;

Counts 3, 5, 8, 10, 12, 13, 19, 21, 24, and  
26-30: 21 U.S.C. § 841(a)(1) and  
(b)(1)(B): Possession With Intent to  
Distribute 100 Grams and More of  
Heroin; 18 U.S.C. § 2: Aiding and  
Abetting;

Counts 4, 7, 9, 11, 14-16 and 25:  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C):  
Possession With Intent to Distribute  
Heroin; 18 U.S.C. § 2: Aiding and  
Abetting;

Count 20: 21 U.S.C. §§ 841(a)(1) and  
(b)(1)(C): Distribution of Heroin; 18  
U.S.C. § 2: Aiding and Abetting.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about May 8, 2016, and continuing to on or about July 12, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ,** **JUAN FRANCISCO RIVERA,** a.k.a. "JC," **ELEODORO SANCHEZ,** a.k.a. "Lolo," **SALVADOR DELGADILLO,** a.k.a. "Spooky," **CARLOS DIAZ,** a.k.a. "Boxer,"

**MORHIAMA ABIGAIL AVILA, SANDRA FRANCIS GUZMAN, BLANCA ELISA TOVAR, a.k.a. “La Guera,” ALBERTO LOZANO-MORALES, a.k.a. “Beto,” and ARMANDO DANIEL MARQUEZ, a.k.a. Danny Marquez,** unlawfully, knowingly and intentionally combined, conspired, confederated, agreed, and acted interdependently with each other and with other persons whose names are known and unknown to the Grand Jury to commit an offense defined in 21 U.S.C. §§ 841(a)(9) and (b)(1)(A), specifically, to distributed 1 kilogram and more of a mixture and substance containing a detectable amount of heroin.

Overt Acts

In furtherance of the conspiracy, and to accomplish the objectives of the conspiracy, the following acts, among others, were committed:

Overt Act One

On April 9, 2016, Alberto Lozano-Morales agreed to determine if Raymundo Muñoz had a gram of heroin to sell to “Guero” and that, if he did, Alberto-Lozano-Morales would deliver the heroin to “Guero.”

Overt Act Two

On April 8, 2016, Juan Francisco Rivera told Raymundo Muñoz that Juan Francisco Rivera had placed an order for heroin with “Tomas” and that the heroin would be delivered the following day.

Overt Act Three

On April 9, 2016, Morhiama Abigail Avila smuggled seven ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Four

On April 9, 2016, after weighing the heroin that had been delivered, Raymundo Muñoz told Juan Francisco Rivera that the heroin weighed ten ounces with the wrapping material, but only 7.6 ounces without the wrapping material, and Juan Francisco Rivera told Raymundo Muñoz that he was only getting charged for seven ounces of heroin.

Overt Act Five

On April 10, 2016, Eleodoro Sanchez picked up heroin from Raymundo Muñoz and paid Raymundo Muñoz \$670 for approximately 16 grams of heroin.

Overt Act Six

On April 10, 2016, Raymundo Muñoz called Eleodoro Sanchez to complain that Eleodoro Sanchez had only paid \$670 instead of the \$800 that he owed, and Sanchez agreed to pay the additional money the following day, saying that one of the people that he had collected from sometimes “spaced out” on how much money he had given to Eleodoro Sanchez.

Overt Act Seven

On April 13, 2016, Raymundo Muñoz talked to one of his heroin customers about the different individuals who were selling heroin for Raymundo Muñoz, including Eleodoro Sanchez, Alberto Lozano-Morales, and “Jaime.”

Overt Act Eight

On April 13, 2016, Juan Francisco Rivera told Raymundo Muñoz that Juan Francisco Rivera had placed an order for heroin with “Tomas” in Mexico.

Overt Act Nine

On April 14, 2016, Juan Francisco Rivera told Raymundo Muñoz that the heroin courier would cross the international border in about an hour, and the two agreed to meet in downtown El Paso, Texas.

Overt Act Ten

On April 14, 2016, Morhiana Abigail Avila smuggled nine ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Eleven

On April 16, 2016, Alberto Lozano-Morales called Raymundo Muñoz, confirmed that Muñoz was home, and indicated that he was going to Muñoz' house to pick up heroin.

Overt Act Twelve

On April 21, 2016, Alberto Lozano-Morales obtained heroin from Raymundo Muñoz at a Family Dollar store.

Overt Act Thirteen

On April 21, 2016, Raymundo Muñoz and Juan Francisco Rivera agreed that they should order eight ounces of heroin.

Overt Act Fourteen

On April 22, 2016, Morhiana Abigail Avila smuggled eight ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Fifteen

On April 23, 2016, Raymundo Muñoz told another individual that Alberto Lozano-Morales is not allowed to sell quarter-ounce quantities of heroin to a certain person, but that Alberto Lozano-Morales could maybe sell grams of heroin to that person.

Overt Act Sixteen

On April 27, 2016, Alberto Lozano-Morales told Raymundo Muñoz that he would not have enough heroin to last through the day, and the two agreed that Alberto Lozano-Morales would go to Raymundo Munoz' house to pick up additional heroin.

Overt Act Seventeen

On April 27, 2016, Eleodoro Sanchez told Raymundo Muñoz that he was almost done and that he only had 12 units of heroin left to sell, and Raymundo Muñoz told Eleodoro Sanchez to call when he was out of heroin.

Overt Act Eighteen

On April 27, 2016, Eleodoro Sanchez picked up eight grams of heroin from Raymundo Muñoz at Raymundo Muñoz' house.

Overt Act Nineteen

On April 27, 2016, Juan Francisco Rivera told Raymundo Muñoz that Juan Francisco Rivera had ordered five ounces of heroin from "Tomas" in Mexico and that it should be delivered the following day.

Overt Act Twenty

On April 28, 2016, Eleodoro Sanchez told Raymundo Muñoz that Eleodoro Sanchez had only been able to make 44 "dimes" from the heroin that he had obtained from Raymundo Muñoz the previous day.

Overt Act Twenty-One

On April 28, 2016, Morhiana Abigail Avila smuggled five ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Twenty-Two

On April 29, 2016, Eleodoro Sanchez told Raymundo Muñoz that Eleodoro Sanchez had sold one and a half “packs” of heroin that day and that he needed to obtain more heroin from Raymundo Muñoz because Eleodoro Sanchez only had seven units of heroin left to sell.

Overt Act Twenty-Three

On April 29, 2016, Eleodoro Sanchez picked up approximately 17 grams of heroin from Raymundo Muñoz before being stopped by the Sunland Park Police Department, who seized the heroin from Eleodoro Sanchez.

Overt Act Twenty-Four

On April 30, 2016, Raymundo Muñoz told his wife about the heroin being seized from Eleodoro Sanchez the previous day and said that Raymundo Muñoz might have to leave if it got too “hot.”

Overt Act Twenty-Five

On May 3, 2016, Alberto Lozano-Morales asked Raymundo Muñoz if he could stop by Raymundo Muñoz’ house to pick up heroin, and Raymundo Muñoz said that he could.

Overt Act Twenty-Six

On May 3, 2016, at the request of Raymundo Muñoz, Alberto Lozano-Morales agreed to deliver a quantity of heroin to another individual, and the other individual agreed that he would pay Alberto Lozano-Morales for the heroin.

Overt Act Twenty-Seven

On May 9, 2016, Eleodoro Sanchez picked up a quantity of heroin from Raymundo Muñoz, and Raymundo Muñoz later complained to Eleodoro Sanchez that Eleodoro Sanchez had only given Raymundo Muñoz \$327 rather than the \$350 that Eleodoro Sanchez claimed to have given.

Overt Act Twenty-Eight

On May 9, 2016, at the request of Raymundo Muñoz, Alberto Lozano-Morales delivered four units of heroin to “Joe.”

Overt Act Twenty-Nine

On May 9, 2016, Juan Francisco Rivera told Raymundo Muñoz that Juan Francisco Rivera had ordered five ounces of heroin from “Tomas” in Mexico.

Overt Act Thirty

On May 9, 2016, Morhiana Abigail Avila smuggled five ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Thirty-One

On May 13, 2016, Juan Francisco Rivera ordered five ounces of heroin from “Tomas,” and “Tomas” agreed to send the heroin the following day.

Overt Act Thirty-Two

On May 13, 2016, Juan Francisco Rivera told Raymundo Muñoz that Juan Francisco Rivera had ordered five ounces of heroin from “Tomas” in Mexico.

Overt Act Thirty-Three

On May 13, 2016, Carlos Diaz called Juan Francisco Rivera and asked Juan Francisco Rivera to obtain two ounces of heroin for Carlos Diaz.

Overt Act Thirty-Four

On May 13, 2016, Juan Francisco Rivera called "Tomas" and increased his order from five to seven ounces of heroin, and "Tomas" told Juan Francisco Rivera that Morhiana Abigail Avila would deliver five ounces of the heroin and Blanca Elisa Tovar would deliver the other two ounces of heroin.

Overt Act Thirty-Five

On May 13, 2016, Morhiana Abigail Avila smuggled five ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Thirty-Six

On May 13, 2016, Blanca Elisa Tovar smuggled two ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Carlos Diaz.

Overt Act Thirty-Seven

On May 13, 2016, Carlos Diaz told Juan Francisco Rivera that the two ounces of heroin that he bought from Juan Francisco Rivera earlier that day weighed 24.9 grams and 24.6 grams.

Overt Act Thirty-Eight

On May 13, 2016, Raymundo Muñoz told Juan Francisco Rivera that two of the five ounces of heroin that he had obtained from Juan Francisco Rivera earlier that day weighed less



than they should, and Juan Francisco Rivera agreed to tell "Tomas" that the bundles of heroin needed to weigh more.

Overt Act Thirty-Nine

On May 16, 2016, Salvador Delgadillo told Raymundo Muñoz that Salvador Delgadillo and Eleodoro Sanchez had already finished selling the heroin that they had, and the three agreed to meet so that Salvador Delgadillo and Eleodoro Sanchez could purchase additional heroin from Raymundo Muñoz.

Overt Act Forty

On May 16, 2016, at the request of Raymundo Muñoz, Alberto Lozano-Morales delivered heroin to "Joe."

Overt Act Forty-One

On May 17, 2016, Salvador Delgadillo and Eleodoro Sanchez purchased approximately eight grams of heroin from Raymundo Muñoz.

Overt Act Forty-Two

On May 17, 2016, Salvador Delgadillo told Raymundo Muñoz that the heroin was somewhat less than eight grams and that Salvador Delgadillo and Eleodoro Sanchez had only been able to make 46 "dimes" of heroin from the heroin that Raymundo Muñoz had sold them.

Overt Act Forty-Three

On May 18, 2016, Juan Francisco Rivera asked Raymundo Muñoz if Raymundo Muñoz wanted to place an order for heroin, and Raymundo Muñoz said that he wanted to order six ounces of heroin.

Overt Act Forty-Four

On May 18, 2016, Juan Francisco Rivera placed an order for six ounces of heroin with “Tomas” in Mexico, and “Tomas” agreed to send the heroin to Juan Francisco Rivera.

Overt Act Forty-Five

On May 18, 2016, Morhiana Abigail Avila exchanged text messages with Juan Francisco Rivera discussing that she was on the Mexican side of the Port of Entry and was in line to enter the United States.

Overt Act Forty-Six

On May 18, 2016, Juan Francisco Rivera and Raymundo Muñoz agreed to meet in downtown El Paso, Texas, and Juan Francisco Rivera told Raymundo Muñoz that Morhiana Abigail Avila told Juan Francisco Rivera that she was in line waiting to cross into the United States.

Overt Act Forty-Seven

On May 18, 2016, Morhiana Abigail Avila smuggled six ounces of heroin into the United States, intending to deliver it to Juan Francisco Rivera, at which time she was apprehended and the heroin was seized by law enforcement agents.

Overt Act Forty-Eight

On May 18, 2016, Raymundo Muñoz and Salvador Delgadillo discussed the fact that Eleodoro Sanchez was not being responsible with his portion of the money that Salvador Delgadillo and Eleodoro Sanchez obtained from selling heroin, and Raymundo Muñoz told Salvador Delgadillo that Salvador Delgadillo needed to take charge of the heroin.

Overt Act Forty-Nine

On May 18, 2016, Raymundo Muñoz sold Salvador Delgadillo eight grams of heroin and then told Salvador Delgadillo that he could get eight “dimes” out of each of the eight grams of heroin that Raymundo Muñoz had sold him.

Overt Act Fifty

On May 19, 2016, Alberto Lozano-Morales told Raymundo Muñoz that Alberto Lozano-Morales had enough heroin to get through the day but that he would probably need additional heroin to sell by the next day.

Overt Act Fifty-One

On May 18, 2016, subsequent to the apprehension of Morhiana Abigail Avila with the six ounces of heroin, “Tomas” asked Juan Francisco Rivera to provide a courier to transport additional loads of heroin, and Juan Francisco Rivera agreed to do so.

Overt Act Fifty-Two

On May 19, 2016, Juan Francisco Rivera told Raymundo Muñoz that they would obtain an additional load of heroin that day and that he was on his way to pick up Sandra Francis Guzman, who would smuggle the heroin into the United States.

Overt Act Fifty-Three

On May 19, 2016, Sandra Francis Guzman smuggled four ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Fifty-Four

On May 19, 2016, Raymundo Muñoz met with Salvador Delgadillo and sold additional heroin to Salvador Delgadillo.

Overt Act Fifty-Five

On May 20, 2016, Eleodoro Sanchez met with Raymundo Muñoz and paid him for the heroin that Raymundo Muñoz had provided to Eleodoro Sanchez that morning.

Overt Act Fifty-Six

On May 20, 2016, Raymundo Muñoz explained to Salvador Delgadillo that Salvador Delgadillo and Eleodoro Sanchez should each be able to make 64 “dimes” from the eight grams of heroin that Raymundo Muñoz provided to each of them, and that they should each therefore make \$320 profit after selling all 64 of the “dimes.”

Overt Act Fifty-Seven

On May 20, 2016, “Tomas” told Juan Francisco Rivera to pick up Sandra Francis Guzman, and Juan Francisco Rivera then called Raymundo Muñoz and said that they would receive four ounces of heroin that day.

Overt Act Fifty-Eight

On May 20, 2016, Sandra Francis Guzman smuggled eight ounces of heroin across the international border and delivered four ounces of the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Fifty-Nine

On May 20, 2016, Sandra Francis Guzman delivered the other four ounces of heroin to unknown individuals at a McDonalds restaurant in El Paso, Texas.

Overt Act Sixty

On May 20, 2016, Sandra Francis Guzman provided payment for the heroin to a male individual who then transported the money back to “Tomas” in Mexico.

Overt Act Sixty-One

On May 23, 2016, Raymundo Muñoz and Juan Francisco Rivera discussed the fact that everything was arranged for them to receive a heroin shipment the following day.

Overt Act Sixty-Two

On May 24, 2016, Sandra Francis Guzman smuggled heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Sixty-Three

On May 25, 2016, Salvador Delgadillo told Raymundo Muñoz that “Chuy” was trying to sell heroin in Salvador Delgadillo’s territory, and Raymundo Muñoz gave Salvador Delgadillo advice on how to conduct his drug dealing.

Overt Act Sixty-Four

On May 26, 2016, Raymundo Muñoz agreed to sell Salvador Delgadillo and Eleodoro Sanchez eight grams of heroin, and Armando Daniel Marquez thereafter delivered the heroin to Salvador Delgadillo and Eleodoro Sanchez.

Overt Act Sixty-Five

On May 27, 2016, Alberto Lozano-Morales called Raymundo Muñoz and arranged to go to Raymundo Muñoz’ house to pick up eight grams of heroin.

Overt Act Sixty-Six

On May 29, 2016, Raymundo Muñoz asked Juan Francisco Rivera to order six ounces of heroin, and Juan Francisco Rivera then placed an order with “Tomas” for six ounces of heroin.

Overt Act Sixty-Seven

On May 29, 2016, Sandra Francis Guzman smuggled six ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Sixty-Eight

On May 30, 2016, at Raymundo Munoz' direction, Armando Daniel Marquez delivered heroin to "Chuy" in Las Cruces, New Mexico.

Overt Act Sixty-Nine

On May 31, 2016, Raymundo Muñoz complained to another man regarding the quality of the cocaine that the other man had given Muñoz in exchange for heroin, saying that Muñoz' customers were complaining.

Overt Act Seventy

Beginning on June 2, 2016, Raymundo Muñoz began telling many of his heroin customers that he was no longer selling small amounts of heroin and began directing customers who wanted to purchase smaller amounts to Alberto Lozano-Morales and Armando Daniel Marquez.

Overt Act Seventy-One

On June 2, 2016, Raymundo Muñoz asked Juan Francisco Rivera to order five ounces of heroin, and Juan Francisco Rivera then ordered the five ounces of heroin from "Tomas" in Mexico.

Overt Act Seventy-Two

On June 3, 2016, Sandra Francis Guzman smuggled five ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who then gave the heroin to Raymundo Muñoz.

Overt Act Seventy-Three

On June 4, 2016, Salvador Delgadillo picked up approximately eight grams of heroin from Raymundo Muñoz and paid Raymundo Muñoz \$420.

Overt Act Seventy-Four

On June 14, 2016, Armando Daniel Marquez called “Juan” and said that Armando Daniel Marquez had heroin ready to sell to “Juan” and the two agreed to meet at the “same place.”

Overt Act Seventy-Five

On June 14, 2016, Armando Daniel Marquez delivered heroin to Salvador Delgadillo.

Overt Act Seventy-Six

On June 14, 2016, “Casper” called Armando Daniel Marquez and asked for a gram of narcotics, and Armando Daniel Marquez told “Casper” that he would call “Casper” when Armando Daniel Marquez and Raymundo Muñoz returned from Alamogordo, New Mexico.

Overt Act Seventy-Seven

On June 14, 2016, Juan Francisco Rivera told Raymundo Muñoz that “Tomas” would be sending them six ounces of heroin that day and would send an additional two ounces of heroin the following day.

Overt Act Seventy-Eight

On June 14, 2016, Sandra Francis Guzman smuggled six ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera.

Overt Act Seventy-Nine

On June 15, 2016, Juan Francisco Rivera had another individual give the six ounces of heroin to Raymundo Muñoz.

Overt Act Eighty

On June 15, 2016, Raymundo Muñoz complained to Juan Francisco Rivera that each ounce of the heroin was one gram short.

Overt Act Eighty-One

On June 15, 2016, Juan Francisco Rivera told Sandra Francis Guzman that he was going to take her to the Port of Entry so that she could pick up two ounces of heroin.

Overt Act Eighty-Two

On June 15, 2016, Sandra Francis Guzman smuggled two ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who gave the heroin to Raymundo Muñoz.

Overt Act Eighty-Three

On June 15, 2016, Juan Francisco Rivera gave the money for two ounces of heroin to an unknown man so that the man could take the money back to "Tomas" in Mexico.

Overt Act Eighty-Four

On June 20, 2016, Raymundo Muñoz told Juan Francisco Rivera that he wanted to order five ounces of heroin, and Juan Francisco Rivera then called "Tomas" and ordered six ounces of heroin.

Overt Act Eighty-Five

On June 20, 2016, Juan Francisco Rivera told "Tomas" that he had the gun that "Tomas" had asked for and that he would send the gun to "Tomas" in Mexico.



Overt Act Eighty-Six

On June 20, 2016, Sandra Francis Guzman smuggled six ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who gave the heroin to Raymundo Muñoz.

Overt Act Eighty-Seven

On June 20, 2016, Raymundo Muñoz gave Juan Francisco Rivera \$3650 to pay for almost all of five ounces of the heroin, and Juan Francisco Rivera said that he would pay the missing \$100 and the additional money for the sixth ounce of heroin.

Overt Act Eighty-Eight

On June 20, 2016, Juan Francisco Rivera gave the money for two ounces of heroin to an unknown woman so that the woman could take the money back to "Tomas" in Mexico.

Overt Act Eighty-Nine

On June 20, 2016, "Guero" asked Armando Daniel Marquez to sell "Guero" heroin, and Armando Daniel Marquez told "Guero" to get the heroin from Alberto Lozano-Morales.

Overt Act Ninety

On June 21, 2016, Armando Daniel Marquez answered Raymundo Muñoz' cellular telephone and told the caller that the caller could come over to pick up a gram of heroin as long as the caller had the money to pay for the heroin.

Overt Act Ninety-One

On June 23, 2016, Raymundo Muñoz asked Juan Francisco Rivera to place an order for five ounces of heroin, and Juan Francisco Rivera then placed the heroin order with "Tomas."

Overt Act Ninety-Two

On June 24, 2016, Juan Francisco Rivera asked Sandra Francis Guzman to smuggle a gun to “Tomas” in Mexico by hiding the gun in her clothing when she crossed the border into Mexico to pick up a load of six ounces of heroin, and Sandra Francis Guzman agreed to do so.

Overt Act Ninety-Three

On June 24, 2016, Juan Francisco Rivera dropped Sandra Francis Guzman off on the United States side of the Port of Entry, and Sandra Francis Guzman attempted to enter Mexico with loaded .380 caliber Hi-Point semiautomatic pistol hidden inside her body and clothing.

Overt Act Ninety-Four

On June 24, 2016, after Sandra Francis Guzman’s apprehension with the gun, “Tomas” informed Juan Francisco Rivera that Blanca Elisa Tovar would deliver five ounces of heroin to Juan Francisco Rivera.

Overt Act Ninety-Five

On June 24, 2016, Blanca Elisa Tovar smuggled five ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who gave the heroin to Raymundo Muñoz.

Overt Act Ninety-Six

On June, 26, 2016, Blanca Elisa Tovar smuggled five ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera.

Overt Act Ninety-Seven

On June 26, 2016, Raymundo Muñoz asked Armando Daniel Marquez to deliver a gram of heroin to “Tarango,” and Armando Daniel Marquez agreed to do so.

Overt Act Ninety-Eight

On June 28, 2016, Juan Francisco Rivera placed a heroin order with “Tomas” in Mexico.

Overt Act Ninety-Nine

On June 28, 2016, “Tomas” told Juan Francisco Rivera that Blanca Elisa Tovar was on her way to deliver the heroin, and Juan Francisco Rivera immediately called Raymundo Muñoz to tell Raymundo Muñoz to get closer to Juan Francisco Rivera’s location because they had just dropped off Blanca Elisa Tovar.

Overt Act One Hundred

On June 28, 2016, Blanca Elisa Tovar smuggled five ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who gave the heroin to Raymundo Muñoz.

Overt Act One Hundred One

On June 28, 2016, Salvador Delgadillo and Raymundo Muñoz had multiple conversations in which Salvador Delgadillo agreed to trade guns to Raymundo Muñoz in exchange for heroin so that Raymundo Muñoz could send the guns to the drug suppliers in Mexico.

Overt Act One Hundred Two

On July 1, 2016, Raymundo Muñoz asked Juan Francisco Rivera to place an order for seven ounces of heroin, and Juan Francisco Rivera then placed the order for seven ounces of heroin with “Tomas” in Mexico.

Overt Act One Hundred Three

On July 1, 2016, Blanca Elisa Tovar smuggled seven ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who gave the heroin to Raymundo Muñoz.

Overt Act One Hundred Four

On July 5, 2016, Juan Francisco Rivera spoke with various Barrio Azteca gang members about attempting to send a gun to Mexico.

Overt Act One Hundred Five

On July 5, 2016, Juan Francisco Rivera provided a .40 caliber Sig Sauer semiautomatic pistol to two individuals so that the individuals could take the gun to Barrio Azteca gang members in Mexico.

Overt Act One Hundred Six

On July 5, 2016, Juan Francisco Rivera told Raymundo Muñoz that he had placed a heroin order with "Tomas" in Mexico and that the heroin would be delivered the following day.

Overt Act One Hundred Seven

On July 6, 2016, Blanca Elisa Tovar smuggled six ounces of heroin across the international border and delivered the heroin to Juan Francisco Rivera, who gave the heroin to Raymundo Muñoz.

Overt Act One Hundred Eight

On July 10, 2016, Juan Francisco Rivera told Raymundo Muñoz that Juan Francisco Rivera and Raymundo Muñoz would receive a heroin shipment the following day before noon, and that Blanca Elisa Tovar would be the person delivering the heroin.

Overt Act One Hundred Nine

On July 11, 2016, Blanca Elisa Tovar smuggled seven ounces of heroin across the international border, intending to deliver it to Juan Francisco Rivera and Raymundo Muñoz, at which time, all three individuals were arrested.

In violation of 21 U.S.C. § 846.

Count 2

On or about April 9, 2016, in Doña Ana County, in the District of New Mexico, the defendant, **ALBERTO LOZANO-MORALES, a.k.a. "Beto,"** unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 3

On or about April 9, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **MORHIAMA ABIGAIL AVILA,** unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 4

On or about April 10, 2016, in Doña Ana County, in the District of New Mexico, the defendants, **RAYMUNDO MUÑOZ** and **ELEODORO SANCHEZ, a.k.a. "Lolo,"**

unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 5

On or about April 14, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **MORHIAMA ABIGAIL AVILA**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 6

On or about April 16, 2016, in Doña Ana County, in the District of New Mexico, the defendants, **RAYMUNDO MUÑOZ** and **ALBERTO LOZANO-MORALES, a.k.a. "Beto,"** unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 7

On or about April 21, 2016, in Doña Ana County, in the District of New Mexico, the defendants, **RAYMUNDO MUÑOZ** and **ALBERTO LOZANO-MORALES, a.k.a. "Beto,"** unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 8

On or about April 22, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **MORHIAMA ABIGAIL AVILA**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 9

On or about April 27, 2016, in Doña Ana County, in the District of New Mexico, the defendants, **RAYMUNDO MUÑOZ** and **ELEODORO SANCHEZ, a.k.a. "Lolo,"** unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 10

On or about April 28, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **MORHIAMA ABIGAIL AVILA**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 11

On or about April 29, 2016, in Doña Ana County, in the District of New Mexico, the defendants, **RAYMUNDO MUÑOZ** and **ELEODORO SANCHEZ, a.k.a. "Lolo,"**

unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 12

On or about May 9, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **MORHIAMA ABIGAIL AVILA**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 13

On or about May 13, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **MORHIAMA ABIGAIL AVILA**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 14

On or about May 19, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **SANDRA FRANCIS GUZMAN**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.



In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 15

On or about May 20, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **SANDRA FRANCIS GUZMAN**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 16

On or about May 24, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **SANDRA FRANCIS GUZMAN**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 17

On or about May 25, 2016, in Doña Ana County, in the District of New Mexico, the defendants, **RAYMUNDO MUÑOZ** and **SALVADOR DELGADILLO, a.k.a. "Spooky,"** unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 18

On or about May 27, 2016, in Doña Ana County, in the District of New Mexico, the defendants, **RAYMUNDO MUÑOZ** and **ALBERTO LOZANO-MORALES, a.k.a. "Beto,"** unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 19

On or about May 29, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **SANDRA FRANCIS GUZMAN,** unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 20

On or about May 30, 2016, in Doña Ana County, in the District of New Mexico, the defendants, **RAYMUNDO MUÑOZ** and **ARMANDO DANIEL MARQUEZ, a.k.a. Danny Marquez,** unlawfully, knowingly, and intentionally distributed a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 21

On or about June 3, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a.**

“JC,” and **SANDRA FRANCIS GUZMAN**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 22

On or about June 14, 2016, at approximately 8:13 a.m., in Doña Ana County, in the District of New Mexico, the defendant, **ARMANDO DANIEL MARQUEZ, a.k.a. Danny Marquez**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 23

On or about June 14, 2016, at approximately 12:26 p.m., in Otero County, in the District of New Mexico, the defendant, **ARMANDO DANIEL MARQUEZ, a.k.a. Danny Marquez**, unlawfully, knowingly and intentionally used a communication facility, a telephone, to further the commission of a drug trafficking crime, namely, conspiracy to possess with intent to distribute a controlled substance, contrary to 21 U.S.C. § 846.

In violation of 21 U.S.C. § 843(b).

Count 24

On or about June 14-15, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. “JC,”** and **SANDRA FRANCIS GUZMAN**, unlawfully, knowingly, and intentionally

possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 25

On or about June 15, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **SANDRA FRANCIS GUZMAN**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), and 18 U.S.C. § 2.

Count 26

On or about June 20, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **SANDRA FRANCIS GUZMAN**, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 27

On or about June 24, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **BLANCA ELISA TOVAR, a.k.a. "La Guera,"** unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 28

On or about June 28, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **BLANCA ELISA TOVAR, a.k.a. "La Guera,"** unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 29

On or about July 2, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **BLANCA ELISA TOVAR, a.k.a. "La Guera,"** unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

Count 30


On or about July 6, 2016, in Doña Ana County, in the District of New Mexico, and elsewhere, the defendants, **RAYMUNDO MUÑOZ, JUAN FRANCISCO RIVERA, a.k.a. "JC,"** and **BLANCA ELISA TOVAR, a.k.a. "La Guera,"** unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, 100 grams and more of a mixture and substance containing a detectable amount of heroin.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), and 18 U.S.C. § 2.

A TRUE BILL:

/s/  
FOREPERSON OF THE GRAND JURY

  
Assistant United States Attorney

  
7/11/2016 3:25 PM